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The Honorable Christie Whitman, Administrator U.S. Environmental Protection Agency P.O. Box 1473 Merrifield, VA 22116

Chemical Right to Know Program Attention:

HPV Consortium

Lubricating Oil Basestocks Test Plan

Dear Administrator Whitman:

The American Petroleum Institute, on behalf of the Petroleum HPV Testing Group, is pleased to submit the Lubricating Oil Basestocks Test Plan and Robust Summary. Our consortium has chosen not to use the HPV Tracker system for submission of our test plans due to the complexity of petroleum substances categories and the associated test plans. We are therefore submitting this test plan, as well as the robust summary, directly to EPA to make available for public comment.

Electronic copies of the test plan (in .pdf format) and robust summary (in .pdf format and as an IUCLID export file) are accompanying this letter via email to the EPA HPV robust summary email address (http://www.epa.qov/chemrtk/srbstsum.htm). This submission is also being sent, via email, to the individuals listed below, including Mr. Charles Auer.

Please feel free to contact me (202-682-8344; twerdokl@api.org) or Tom Gray (202-682-8480; grayt(@api.org) with any comments or questions you may have regarding this submission.

Sincercly,

Lorraine E. Twerdok Administrator, API Subscription Research Programs

cc: Charles Auer, EPA Rich Hefter, EPA via email

Oscar Hernandez, EPA

Petroleum HPV Testing Consortium Oversight and Technical Committees